

UNITED STATES DISTRICT COURT  
for the  
Southern District of Texas

United States Courts  
Southern District of Texas  
FILED

August 25, 2021

United States of America  
v.

Earnest Jerome Taylor Jr.

Nathan Ochsner, Clerk of Court

Case No.

**4:21-MJ-1815**

Defendant(s)

### CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 24, 2021 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

*Offense Description*

18 USC 111

ASSAULT ON A FEDERAL AGENT, the defendant intentionally attempted to inflict injury upon a federal agent with a dangerous weapon.

18 USC 922(g)

FELON IN POSSESSION OF A FIREARM, the defendant knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, in and affecting interstate commerce.

This criminal complaint is based on these facts:

See Attached Affidavit of probable cause

☒ Continued on the attached sheet.




*Complainant's signature*

Doug Kutta, TIGTA Special Agent

*Printed name and title*

Sworn to before me telephonically.

Date: August 25, 2021



*Judge's signature*

City and state: Houston, Texas

United States Magistrate Judge Peter Bray

*Printed name and title*

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**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Special Agent Doug Kutta, being first duly sworn, state:

**AGENT BACKGROUND**

1. I am a Special Agent (SA) for Treasury Inspector General for Tax Administration and have been assigned to the Houston, Texas Field Office since 2019, which gives me the authority to obtain and execute federal arrest warrants. I have been employed as a SA for approximately nineteen (19) years and investigated Federal crimes that include assault, fraud, violent crimes and other white-collar crimes.

**INTRODUCTION**

2. I make this affidavit in support of a criminal complaint establishing probable cause for the arrest of Ernest Taylor Jr. (TAYLOR) for committing the following offenses in the Southern District of Texas on or about August 24, 2021:

- a. 18 U.S.C. § 111, Assault on a Federal Officer;
- b. 18 U.S.C. § 922, Felon in Possession of a Firearm;

3. As described below, there is probable cause to believe that TAYLOR, a convicted felon, fired a weapon at Federal Agents attempting to serve a subpoena at TAYLOR's residence, located at 10822 Carlton Drive, Houston, TX 77047, Southern District of Texas.

4. Specifically, on or about August 23, 2021, SA Brandon Welch with the Internal Revenue Service – Criminal Investigations (IRS-CI) attempted to serve a subpoena issued through the United States District Court for the Eastern District of Kentucky. SA Welch arrived at 4711 Abercorn St, Rosharon, TX 77583, which was an address associated to TAYLOR, who was under investigation by IRS-CI. SA Welch observed a white truck in the driveway of 4711 Abercorn. SA Welch noted the Texas license plate, KHP-4788, of the white truck.

5. On August 24, 2021, SA Micah Arledge queried the license plate of the white truck and learned that it was registered to a William J McDougld. Later that day, SA Arledge and SA Welch traveled to 10822 Carlton Drive, Houston, TX 77047, which was another address believed to be associated to TAYLOR. They were attempting to make contact with TAYLOR to serve the subpoena, but they saw the white truck with Texas license plate, KHP-4788, leaving the location. The Agents attempted to follow the white truck until it began to drive erratic. At that point, they concluded any attempts to follow the white truck by pulling into a gas station. After several minutes, they decided to return to the 10822 Carlton Drive, Houston, TX 77047 and upon turning on to Carlton Drive, they observed the white truck parked near the 10822 Carlton Drive residence. As Agents attempted to make contact with TAYLOR, he began firing several gun shots at the Agent's vehicle.

(NOTE: He was later arrested by local law enforcement officers and he is presently in the Harris County Jail.)

6. The Federal investigation into the incident is beginning and the affiant does not have complete information, but the general facts were relayed verbally. In addition, the affiant obtained the criminal history for TAYLOR which shows that he was previously convicted of a crime punishable by imprisonment for a term exceeding one year. Affiant also has probable cause to believe that the firearm used by TAYLOR was not manufactured in the State of Texas and traveled in and affected interstate commerce, in violation of Title 18, United States Code § 922(g)(1).

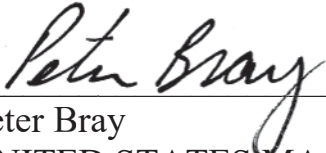
Respectfully submitted,



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Special Agent Doug Kutta

Subscribed and sworn telephonically pursuant to Fed. R. Crim. P. 4.1 and 41(d) (3) on August 25, 2021, and I find probable cause.



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Peter Bray

UNITED STATES MAGISTRATE JUDGE